



U.S. Department of Justice

United States Attorney

Western District of Tennessee

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November 2, 2023

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John Keith Perry
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Martin Zummach
7125 Getwell Rd. Ste. 201
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662-349-6900

Re: *United States vs. Emmitt Martin et al.*
Cr. No. 2:23-cr-20191-MSN

Dear Mr. Massey, Mr. Perry, Mr. Stengel, and Mr. Zummach:

We write to provide you with additional discovery in this case. In addition to the materials previously provided to you and described in our letter dated September 21, 2023:

1. As to Rule 16(a)(1)(A) and (B), statements by your clients, including reports and statements provided to investigators in relation to this matter and other incidents, are included with discovery.
2. As to Rule 16(a)(1)(E), documents, including police reports, interview reports, investigative reports, transcripts of witness statements, and personnel and training records; videos; audio recordings; and photographs are included with discovery.

3. The government is cognizant of its continuing obligation pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963), and its progeny and will disclose such materials in a timely manner, should they exist. Additionally, the government is aware of its continuing obligation to make impeachment evidence available in a timely manner, should it exist.

4. Discovery, including police reports, FBI reports, TBI reports, transcripts of witness statements, personnel and training records, and audio/video recordings have been made available to you at the United States Attorney's Office. Other than certain items made available for inspection only, this discovery has been downloaded to drives you have provided, or will be downloaded to drives once you provide them. Additional materials have been placed on USAfx. You should have access today. This evidence is BATES stamped US_00010952 - US_00046118. Please let us know if you have any issues accessing these materials, and please contact us to schedule a time to review the discovery made available for inspection if you would like to do so.

5. We will make additional productions as needed. Please feel free to contact us at (901) 544-4231 (David) or (202) 616-2430 (Kate) if you have any questions.

Very truly yours,

KEVIN G. RITZ
United States Attorney

By: s/David Pritchard
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cc: Clerk of the Court (W.D. Tenn.)

CERTIFICATE OF SERVICE

I, Kathryn E. Gilbert, hereby certify that the on the date below, I electronically filed the foregoing with the Clerk of Court for the Western District of Tennessee via the Electronic File System which sent notification to counsel of record.

s/ Kathryn E. Gilbert
KATHRYN E. GILBERT
November 2, 2023